

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In Re:)	16-32160
)	
JOSEFINA S. ANGELES,)	Chapter 13
)	
Debtor(s).)	Judge CASSLING

NOTICE OF MOTION

To the following persons or entities who were served via electronic mail by the Bankruptcy Court:

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov
Tom Vaughn, Chapter 13 Trustee: ecf@tvch13.net

To the following persons or entities who were served via regular U.S. Mail:

See attached service list

PLEASE TAKE NOTICE that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his stead at 219 S. Dearborn, Chicago, IL 60604, and in the following courtroom (or any other place posted), and present the attached **Motion to Re-Open the Case to Enter a Discharge**, at which time and place you may appear:

JUDGE: CASSLING
ROOM: 619
DATE: January 16, 2020
TIME: 9:30 a.m.

/s/ David M. Siegel

PROOF OF SERVICE

The undersigned does hereby certify that copies of this Notice and attachments were served to the above persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, with proper postage prepaid, or served electronically by the Bankruptcy Court, before 5:00 p.m. on December 27, 2019.

/s/ David M. Siegel
David M. Siegel, A.R.D.C. #6207611
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES, LLC
790 Chaddick Drive
Wheeling, IL 60090
847/ 520-8100

To the following persons or entities who were served via regular U.S. Mail:

Josefina Angeles
427 S. Williams Ave.
Palatine, IL 60074

IRS
P.O. Box 7346
Philadelphia, PA 19101

The Payday Loan Store
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380

Capital One Bank
P.O. Box 71083
Charlotte, NC 28272-1083

Merrick Bank
Resurgent Capital Services
P.O. Box 10368
Greenville, SC 29603-0368

Department Store National Bank
c/o Quantum3 Group
P.O. Box 657
Kirkland, WA 98083-0657

Jefferson Capital Systems/Avant
P.O. Box 7999
St. Cloud, MN 56302

Illinois Dept. of Revenue, Bankruptcy
P.O. Box 19035
Springfield, IL 62794

US Dept. of Education/Mohela
63.3 Spirit Drive
Chesterfield, MO 63005

Barclay, Dixon & Smith
30 S. LaSalle St., Ste. 900
Chicago, IL 60603

Banquet Financial
607 E. Dundee Ave., Unit A
Elgin, IL 60120

Duke N Duke
1015 W. North Ave.
Villa Park, IL 60181

Harris & Harris
111 W. Jackson Blvd., Ste. 400
Chicago, IL 60604

Northwest Community Hospital
P.O. Box 5990
Carol Stream, IL 60197

Opportunity/Progreso
1600 Seaport Blvd.
Redwood City, CA 94063

Professional Cardiac Services
520 E. 22nd St.
Lombard, IL 60148

State Collection Service
2509 S. Stoughton Rd.
Madison, WI 53716-3314

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In Re:)	16-32160
)	
JOSEFINA S. ANGELES,)	Chapter 13
)	
Debtor(s).)	Judge CASSLING

MOTION TO RE-OPEN CASE TO ENTER A DISCHARGE

NOW COME the Debtor, by and through her attorneys, DAVID M. SIEGEL & ASSOCIATES, LLC to present their Motion, and in support thereof state as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. The Debtor filed a petition for relief pursuant to Chapter 13 under Title 11 USC on October 7, 2016. Tom Vaughn was appointed Trustee in this case.
3. The Trustee filed a Notice of Completion of Plan Payments on October 21, 2019.
4. A Notice to Individual Debtors in Chapter 13 Cases of Required Documents for Discharge was filed by the Court on October 22, 2019.
5. The case was closed without discharge on December 4, 2019.
6. The Chapter 13 Debtor's Certifications Regarding Domestic Support Obligations and Section 522(q) was filed the next day, on December 5, 2019.
7. The delay was due to an inadvertent oversight by the Debtor. The delay was unintentional, and was not done to cause harm to creditors of the Debtor.
6. The Debtor seeks leave of the court to allow the late filing of the Debtor's Certifications Regarding Domestic Support Obligations and Section 522(q); and requests that the court re-open the case and direct the Clerk of the Bankruptcy Court to issue an order of discharge.

WHEREFORE, the Debtor, Josefina S. Angeles, prays that this Honorable Court enter an Order to allow late filing of Debtor's Certifications Regarding Domestic Support Obligations and Section 522(q) document, to re-open the case, to direct the issue of an order of discharge, and for such other relief that the Court deems just and proper.

Respectfully Submitted,

/s/ David M. Siegel

David M. Siegel, A.R.D.C. #6207611
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES, LLC
790 Chaddick Drive
Wheeling, IL 60090
847/ 520-8100